IN THE

Supreme Court of the United States

OCTOBER TERM, 1965

No. 42

RALPH GINZBURG, DOCUMENTARY BOOKS, INC., EROS MAGAZINE, INC., LIAISON NEWS LETTER, INC.,

Petitioners,

—v.—

UNITED STATES OF AMERICA,

Respondent.

BRIEF OF THE AMERICAN CIVIL LIBERTIES UNION AND THE AMERICAN CIVIL LIBERTIES UNION OF PENNSYLVANIA, AMICI CURIAE IN SUPPORT OF PETITION FOR REHEARING

BERNARD A. BERKMAN
1320 The Superior Building
Cleveland, Ohio 44114

MELVIN L. WULF
156 Fifth Avenue
New York, New York 10010

MURRAY POWLEN
1405 Locust Street
Philadelphia, Pennsylvania

Attorneys for Amici Curiae

INDEX

TABLE OF AUTHORITIES

Cases:

IN THE

Supreme Court of the United States

OCTOBER TERM, 1965

No. 42

RALPH GINZBURG, DOCUMENTARY BOOKS, INC., EROS MAGAZINE, INC., LIAISON NEWS LETTER, INC.,

Petitioners,

—v.—

UNITED STATES OF AMERICA,

Respondent.

BRIEF IN SUPPORT OF PETITION FOR REHEARING

A bare majority of this Court has affirmed the petitioner's five year prison sentence for nothing more than sending copies of a magazine, a pamphlet and a book through the mail.

With the Government conceding and the Court assuming that the mailed material was, standing alone, protected by the First Amendment,[1] the majority accomplished this re-

[1] See majority opinion, Slip Op., p. 2: ". . . the prosecution . . . assumed that, standing alone, the publications themselves might not be obscene. We . . . assume without deciding that the prosecution could not have succeeded [without proof extrinsic to the printed matter on its face]." And see majority opinion, Slip Op., p. 3, n. 5: ". . . we accept the Government's concession . . . that the prosecution rested upon the manner in which the petitioners' sold the *Handbook;* thus our affirmance implies no agreement with

sult by "an astonishing piece of judicial improvisation"[2] against which petitioner had no opportunity to defend[3] and which further obscures the already muddied waters of the law of obscenity as it affects constitutional protection of free expression.

Apparently dissatisfied with "the perhaps inherent residual vagueness of the *Roth* test"[4] and with the Court's approach in obscenity cases since *Roth* in which "it has regarded the materials as sufficient in themselves for the determination of the question",[5] the majority now holds that "the question of obscenity may include consideration of the setting in which the publications were presented".[6] Thus, publications not obscene on their face under *Roth* standards may be transformed into obscenity if "originated or sold as stock in trade of the sordid business of pandering—the business of purveying textual or graphic matter openly advertised to appeal to the erotic interest of their

---

the trial judge's characterizations of the book outside that setting." See also the majority's characterization of the printed material as "publications which we have assumed but do not hold cannot themselves be adjudged obscene in the abstract . . ." Slip Op., p. 11. And see comments of Harlan, *J.*, dissenting, Slip Op., p. 2: ". . . the Court in the last analysis sustains the convictions on the express assumption that the items held to be obscene are not, viewing them strictly, obscene at all. . . ."; and Stewart, *J.*, dissenting, Slip Op., p. 3: "The Court today appears to concede that the materials Ginzburg mailed were themselves protected by the First Amendment."

[2] Slip Op., p. 3, Harlan, *J.*, dissenting.

[3] *Amici* will not belabor the fact that petitioner stands convicted by a theory of law never urged by the Government or the courts below, and never briefed or argued before this Court. See Black, *J.*, dissenting, Slip Op., pp. 2-3, and Petition for Rehearing.

[4] Majority opinion, Slip Op., p. 12, n. 19.

[5] *Id.* at p. 2.

[6] *Ibid.*

customers".[7] "Where the purveyor's sole emphasis is on the sexually provocative aspects of his publications, that act may be decisive in the determination of obscenity."[8] Apparently this variable standard of obscenity, which depends upon proof extrinsic to the publications themselves, is to be applied only "in close cases"[9] in order "to resolve all ambiguity and doubt"[10] as to the obscenity of "material lending itself to . . . exploitation of interests in titillation by pornography."[11]

That this reformulation[12] of the Constitutional standard represents a new and uncharted course in the field of the law of obscenity can scarcely be denied.

The variable concept of obscenity as "a chameleonic quality of material that changes with time, place and circumstance"[13] first appeared in the concurring opinion of Chief Justice Warren in *Roth* v. *United States.*[14] Suggesting that "[t]he conduct of the defendant is the central issue, not the obscenity of a book or picture,"[15] he con-

---

[7] *Id.* at p. 4.

[8] *Id.* at p. 7.

[9] *Id.* at p. 10.

[10] *Id.* at p. 11.

[11] *Id.* at p. 12.

[12] Or formulation. See Stewart, *J.*, dissenting, Slip Op., p. 2: "It is not accurate to say that the *Roth* opinion 'fashioned standards' for obscenity, because, as the Court explicitly stated, no issue was there presented as to the obscenity of the material involved. 354 U. S. at 481, n. 8. And in no subsequent case has a majority of the Court been able to agree on any such 'standards'."

[13] Lockhart and McClure, *Censorship of Obscenity, The Developing Constitutional Standards,* 45 Minn. L. Rev. 5, 68 (1960).

[14] 354 U. S. 476 (1957).

[15] *Id.* at 495.

curred in the affirmance of the convictions because the defendants "were engaged in the business of purveying . . . matter openly advertised to appeal to the erotic interest of their customers" and "were plainly engaged in the commercial exploitation of the morbid and shameful craving for materials with prurient effect." [16]

The majority in *Roth* refused to employ such an approach, preferring to attempt to articulate constitutional standards for judging the materials themselves,[17] and Mr. Justice Harlan, dissenting in *Roth,* specifically rejected the variable concept of obscenity.[18]

Until *Jacobellis* v. *Ohio,*[19] no further support on the Court for the "variable" concept of obscenity could be mustered. In *Jacobellis,* however, the Chief Justice and Mr. Justice Clark, dissenting, would have affirmed the conviction of the motion picture exhibitor at least in part upon the ground that the promise of sexual titillation in the published advertising for the film rendered the film itself obscene.[20] But Mr. Justice Goldberg, concurring, explicitly rejected the notion that "the exaggerated character of the advertising rather than the obscenity of the film is to be the Constitutional criterion".[21] Moreover, in *Manual Enterprises, Inc.* v. *Day,*[22] Mr. Justice Harlan, in the prevailing opinion, took occasion to remark:

---

[16] *Id.* at 495-6.

[17] *Id.* at 488, 490.

[18] *Id.* at 507-508.

[19] 378 U. S. 184 (1964).

[20] *Id.* at 201, n. 2.

[21] *Id.* at 198.

[22] 370 U. S. 478, 491 (1962).

> "And, neither with respect to the advertisements nor the magazines themselves, do we understand the Government to suggest that the advertising provisions of [18 U.S.C. §1461] are violated if the mailed material merely 'gives the leer that promises the customer some obscene pictures' *United States* v. *Hornick,* 229 F. 2d 120, 121. *Such an approach to the statute could not withstand the underlying precepts of Roth.* See *Poss* v. *Christenberry,* 179 F. Supp. 411, 415; cf. *United States* v. *Schillaci,* 166 F. Supp. 303, 306." (Emphasis supplied.)

Amici believe that the new approach employed by the majority to affirm the petitioner's conviction raises grave constitutional implications for freedom of expression, quite apart from the mailed material here involved and the "sordid business" in which petitioner was engaged.

While *amici's* skepticism as to the ultimate value of *Roth* and its progeny as a tool for separating suppressible from non-suppressible utterance is a matter of record,[23] a number of additional matters raised by the majority opinion in the instant case further debilitate the formula there enunciated.

I.

Although the determination of the social importance of forms of expression as a test of whether they may be constitutionally suppressed is fraught with difficulty,[24] the

---

[23] See Brief of American Civil Liberties Union and American Civil Liberties Union of Pennsylvania in the case at bar; see also Brief of American and Ohio Civil Liberties Unions in *Jacobellis* v. *Ohio,* 378 U. S. 184 (1964).

[24] See discussion of this problem in our *amici* brief on the merits, pp. 32-37.

rule now expounded by the majority for the first time operates to suppress publications with conceded social importance.[25] And it does so on the basis of advertising which was itself not obscene[26] and which described materials which were by definition not obscene either.[27]

II.

The majority in *Memoirs* v. *Massachusetts*[28] reaffirms the holding in *Roth* and subsequent cases that before a publication may be constitutionally found to be obscene "three elements must coalesce: it must be established that (a) the dominant theme of the *material* taken as a whole appeals to a prurient interest in sex; (b) the *material* is patently offensive because it affronts contemporary com-

---

[25] Majority opinion, Slip Op., p. 9. But see Kalven, *Metaphysics of the Law of Obscenity*, 1960 Sup. Ct. Review 13-14: "If the obscene is constitutionally subject to ban because it is worthless, it must follow the obscene can include only that which is worthless."

[26] Majority opinion, Slip Op., p. 2, n. 4. One reflects with some incredulity that here the majority concedes that "the convictions on the counts for mailing the advertising stand only if the publications [are obscene]," then finds the publications obscene because of the salacious (but not obscene) manner in which they were advertised, and finally affirms the advertising count convictions on the ground that the advertised publications were obscene. Such bootstrap arguments, reminiscent of the two lions who devoured each other and were never seen again, have been rejected before by this Court. See *Johnson* v. *United States*, 333 U. S. 10, 15 (1947) (attempted justification of arrest by search and search by arrest explicitly rejected).

[27] Majority opinion, Slip Op., p. 5, n. 9. "The advertisements . . . promised candor in the treatment of matters pertaining to sex and at the same time proclaimed that they were artistic or otherwise socially valuable. In effect, then, these advertisements represented that the publications are *not* obscene." Douglas, *J.* dissenting, Slip Op. p. 3, n. 3.

[28] 34 U. S. Law Week 4236 (March 21, 1966).

munity standards relating to the description or representation of sexual matters; and (c) the *material* is *utterly without redeeming social value.*" [29] (Emphasis supplied.)

But the rule of the instant case makes it possible to find obscenity without any of these elements.

Where prurient interest is not clearly demonstrable from the publication itself, "[t]he deliberate representation of petitioners' publications as erotically arousing . . . stimulated the reader to accept them as prurient; he looks for titillation, not for saving intellectual content." [30]

Where the patent offensiveness of the material is dubious, "the brazenness of [the pandering] appeal heightens the offensiveness of the publications to those who are offended by such material" and would tend to force public confrontation with the potentially offensive aspects of the work." [31]

And where the social value of the publications whose suppression is sought is not in doubt, "the circumstances of presentation and dissemination of material are equally relevant to determining whether social importance claimed for material in the courtroom was, in the circumstances, pretense or reality".[32]

Even the delicate scale which determines whether prurient appeal of a publication is its dominant theme or merely a concomitant of isolated passages is weighted by the proprietary thumb of the "pandering" element.[33]

---

[29] Majority opinion, *Memoirs* v. *Massachusetts,* Slip Op., p. 5.

[30] Majority opinion, *Ginzburg* v. *United States,* Slip Op., p. 7.

[31] *Ibid.*

[32] *Ibid.*

[33] *Id.* at pp. 7-8.

Thus a publication which is not patently offensive, which has social value and whose dominant appeal is not to prurient interest, may be held obscene merely by applying the "pandering" test *four times* to satisfy the defect in each element and thereby effect the necessary combination to permit suppression of the material!

The retreat from constitutional principle implicit in applying the "pandering" test to all of the elements is manifest. Quite obviously, the application of the same "pandering" element to each of the criteria of obscenity independently gives undue weight to behavior which is not itself obscene. By reducing the requirements of proof of each element of obscenity, the "leer of the sensualist",[34] the sexy wink or the salacious promise of sexual titillation, not in themselves obscene, dilute the proof of obscenity to well below what has been held to be the constitutional minimum.

But apart from the cumulative affect of non-obscene behavior as proof of obscenity, the establishment by the majority of a relationship between "pandering" and each of the elements of obscenity strains logic to the breaking point.

How does "pandering" establish the fact that the *dominant theme* of the material appeals to prurient interest? How can the mere mention in advertising of an obscure scene in a novel of obvious literary merit transform an isolated passage into the dominate theme? Isn't this determination necessarily accomplished by an objective analysis of the material itself, not the purveyor's motivation?

---

[34] *Id.* at p. 5.

How can *patent offensiveness* be enhanced by leering advertising which is not itself obscene? The publication either "goes substantially beyond customary limits of candor in description or representation of [sexual] matters" [35] or it does not, depending upon what a judge, jury or appellate court may determine. A conception of customary limits of candor which varies with the motivation or leering behavior of the distributor defies imagination. Does a photograph of a woman in a modest bathing suit become patently offensive by operation of law merely because it is exhibited with a salacious wink or a prurient smile?

And what of material with *social value* which is somehow contaminated by the impure motivations of the seller? The sole justification in *Roth* for removing obscene expression from the protections of the First Amendment was that it was worthless to society. How, then, by any stretch of logic can material be suppressed, or a purveyor punished for selling it, if it has any value whatever to society?

III.

But, the majority tells us, this rule applies only in "close cases".[36] If the *Roth* standards applied to the material itself are inherently vague,[37] how much more vague is this new standard which invokes a pervasive element "in close cases"? If, by consideration of the publications themselves, "protected expression . . . is often separated from obscenity only by a dim and uncertain line",[38] how much more

---

[35] *Jacobellis* v. *Ohio,* 378 U. S. 184, 191 (1964).

[36] Majority opinion, Slip Op., p. 10.

[37] *Id.* at p. 12, n. 19.

[38] *Bantam Books, Inc.* v. *Sullivan,* 372 U. S. 58 (1963).

dim and uncertain is the distinction between obscene publications, "close cases" and non-obscene "non-close cases"? If a publication, considered by itself, satisfies none of the criteria which must "coalesce" before a finding of obscenity may be made, as here, is it a "close case"? Does it "lend itself to . . . exploitation of interests in titillation by pornography"? If so, what material dealing with sex does not?

Although the *Roth* majority disposed of the argument that its standards were unconstitutionally vague[39] the new "pandering" criteria applicable to "close cases" poses additional problems which require re-examination of the claim of vagueness.[40] And apart from the question of vagueness, what is it about publications with some sexual content, non-obscene in the abstract and with at least some claim to First Amendment protection, which compels them as a matter of constitutional law to be advertised, distributed and sold in more pristine fashion than "lotions, tires, food, liquor, clothing, autos and even insurance policies"[41] to which no First Amendment considerations apply?

---

[39] But see *Ginzburg* v. *United States*, majority opinion, Slip Op., p. 12, n. 19.

[40] See Black, *J.*, dissenting, Slip Op., p. 3: ". . . I think that the criteria declared by a majority of the Court . . . as guidelines for a court or jury to determine whether Ginzburg or anyone else can be punished as a common criminal for publishing or circulating obscene material are so *vague and meaningless* that they practically leave the fate of a person charged with violating censorship statutes to the unbridled discretion, whim and caprice of the judge or jury which tries him." (Emphasis supplied.)

[41] Douglas, *J.* dissenting, Slip Op., p. 1. His conclusion is noteworthy: "The sexy advertisement neither adds to nor detracts from the quality of the merchandise being offered for sale. And I do not see how it adds to or detracts one whit from the legality of the book being distributed. A book should stand on its own, irrespective of the reasons why it was written or the wiles used in selling it."

IV.

Another dangerous seed is left to germinate in this Court's majority opinion. Finding that in distributing the publications in question "[p]etitioners . . . deliberately emphasized the sexually provocative aspects of the work", and "proclaimed its obscenity", the Court affirms the trial court's approach of "taking [petitioners'] own evaluation at face value and declaring the book as a whole obscene despite the other evidence."[42] Quite apart from the fact that the record demonstrates that petitioners' advertising actually proclaimed the *non-obscenity* of their publications,[43] permitting the purveyor's characterization of the publication to control the constitutional determination of whether it may be suppressed as obscene breaks sharply with the underlying philosophy of *Roth*.

Closely allied with the concept of letting the intent of the author, publisher or distributor play a crucial role in the determination of the obscenity of the work,[44] the teaching of *Roth* is that it is *the effect of the material on those it reaches* which is the litmus of obscenity,[45] not "merely that the disseminator or publicizer thinks such appeal exists."[46] For if a leering attempt to create pornography fails and a literary gem is inadvertently born instead, so-

---

[42] Majority opinion, Slip Op., p. 9.

[43] See note 27, *supra*.

[44] Also implicit in the majority opinion; see majority opinion, Slip Op., p. 7, n. 11. The reference is to the *obscenity of the material* as distinguished from the requisite intent necessary *to sustain an obscenity conviction*.

[45] See 354 U. S. at 490.

[46] *United States* v. *Klaw*, 350 F. 2d 155, 166 (2d Cir. 1965).

ciety's interest in preserving it from suppression is no less than if the same beneficial result had been intended by its creator. The focus of governmental power to suppress noxious literature, if such power there be, must be upon the *effect* of the material on its potential audience and not upon the character of the author or disseminator, the cleanliness of his mind, or the purity of his soul. In short, the evil, at least for the purpose of governmental regulation, must be in the eye of the beholder, not in the mind of the purveyor.

V.

We come now to perhaps the greatest mischief, in the view of *amici,* of the majority opinion. In order to put an end to petitioner's "sordid business"[47] without inhibiting "the enterprise of others seeking through serious endeavor to advance human knowledge or understanding in science, literature, or art,"[48] the majority articulates a rule which applies to some booksellers[49] but not to others.[50] The Court's ruling has been recognized as "a mere euphemism for allowing punishment of a person who mails otherwise constitutionally protected material just because a jury or judge may not find him or his business agreeable".[51]

It would have seemed hardly necessary to remind the Court of its obligation to even-handed justice, particularly in the sensitive area of First Amendment rights. For,

---

[47] Majority opinion, Slip Op., p. 4.

[48] *Id.* at p. 12.

[49] Petitioners in *Ginzburg* v. *United States.*

[50] G. P. Putnam's Sons in *Memoirs* v. *Massachusetts.*

[51] Harlan, *J.*, dissenting, Slip Op., p. 2.

"In upholding and enforcing the Bill of Rights, this Court has no power to pick or to choose. When we lose sight of that fixed star of constitutional adjudication, we lose our way. For then we forsake a government of law and are left with government by Big Brother." [52]

• • • • •

The standard enunciated in this case by the majority of the Court to separate obscenity from protected speech transforms the "inherently vague" [53] *Roth* test into a confused, obscure and "tangled state of affairs".[54] As Mr. Justice Black observed, "[N]ot even the most learned judge much less a layman, is capable of knowing in advance of an ultimate decision in his particular case by this Court whether certain material comes within the area of 'obscenity' as that term is confused by the Court today." [55]

The majority's attempt in this case, by patchwork repair, to revamp *Roth's* standards is responsible for the present uncertain posture of the law of obscenity. In our judgment, the confusion which exists today is a manifestation of a basic flaw in the underlying premise of *Roth:* that expression which deals with sex in a particularly offensive manner may be labeled "obscene", and thereafter by a metamorphosis of nomenclature and classification, it becomes unprotected expression. By embarking upon the thankless and futile project of suppressing speech "not

---

[52] Stewart, *J.*, dissenting, Slip Op., p. 4.

[53] Majority opinion, Slip Op., p. 12, n. 19.

[54] Harlan, *J.*, dissenting in *Memoirs* v. *Massachusetts*, Slip Op., p. 1.

[55] Black, *J.*, dissenting in *Ginzburg* v. *United States*.

because it incites but because it offends",[56] this Court has generated more complex problems than it has solved.

In an area where "government may regulate . . . only with narrow specificity" [57] and with "sensitive tools" [58] and "where even reasonable precision is utterly impossible" [59] this Court has adhered to the *Roth* approach despite an inability to obtain a working consensus among its members nor articulate sufficiently detailed working principles for the classification of utterances which *Roth* compels to guide the state and federal courts and legislatures upon whose performance the preservation of freedom of speech must ultimately depend. And it has refused to abandon the *Roth* experiment despite the sharp criticism of Mr. Chief Justice Warren,[60] and Justices Black,[61] Douglas[62] and Harlan,[63] despite Justice Stewart's narrow interpretation of *Roth* which limits it to its facts[64] and despite the admission of

---

[56] Henkin, *Morals and the Constitution: The Sin of Obscenity*, 63 Columbia L. Rev. 391, 393 (1963).

[57] *N. A. A. C. P.* v. *Button*, 371 U. S. 415, 433 (1964).

[58] *Speiser* v. *Randall*, 357 U. S. 513, 525 (1958).

[59] *Commonwealth* v. *Gordon*, 66 Pa. D. & C. 101, 137 (1949).

[60] *Roth* v. *United States*, 354 U. S. at 488-489 (concurring opinion).

[61] *Smith* v. *California*, 361 U. S. 147, 157 (1959) (concurring opinion).

[62] *Roth* v. *United States*, 354 U. S. at 512-514 (dissenting opinion).

[63] *Id.* at 497-498 (concurring in part and dissenting in part).

[64] *Jacobellis* v. *Ohio*, 378 U. S. 184, 197 (1964) (concurring opinion). See also *Ginzburg* v. *United States*, Stewart, *J.*, dissenting, Slip Op., pp. 2-3.

its proponents that the *Roth* formula "is not perfect",[65] raises "difficult problems" [66] and is afflicted with "perhaps inherent residual vagueness." [67] The negative reason for adhering to *Roth*—"that we should try to live with it—at least until a more satisfactory definition is evolved" [68] is not persuasive. "[T]he difficulties of articulating an adequate substitute need not dictate immutable adherence to such a will-o'-the-wisp." [69]

Amici urge this Court to reconsider the ill-conceived amendment of *Roth* which the majority opinion in the instant case has articulated, to recognize that the dissatisfaction of most of the members of this Court with *Roth* as a standard for suppression of expression stems from the inherent illogic and unworkability of the "labeling" process condemned in *New York Times* v. *Sullivan*,[70] and to apply to utterances concerning sex the formula which it employs in determining the suppressibility of other forms of expression—the protective umbrella of the "clear and present danger" standard of the First Amendment. For as this Court has made abundantly clear:

> "Sex, a great and mysterious motive force in human life, has indisputably been a subject of absorbing in-

---

[65] *Jacobellis* v. *Ohio*, 378 U. S. 184, 191 (1964).

[66] *Ibid.*

[67] *Ginzburg* v. *United States*, majority opinion, Slip Op., p. 12, n. 19.

[68] *Jacobellis* v. *Ohio*, 378, U. S. 184, 200 (1964) (concurring opinion).

[69] *United States* v. *Klaw*, 350 F. 2d 155, 165 (2d Cir. 1965).

[70] 376 U. S. 254, 268-269 (1964).

terest to mankind through the ages; it is one of the vital problems of human interest and public concern." [71]

All forms of expression dealing with matters of public concern—whether they deal with sex or not—are entitled to First Amendment protections. The compelling reasons for such a result are eloquently capsulized by Mr. Justice Stewart:

> "Censorship reflects a society's lack of confidence in itself. It is a hallmark of an authoritarian regime. Long ago those who wrote our First Amendment charted a different course. They believed a society can be truly strong only when it is truly free. In the realm of expression they put their faith, for better or for worse, in the enlightened choice of the people, free from the interference of a policeman's intrusive thumb or a judge's heavy hand. So it is that the Constitution protects coarse expression as well as refined, and vulgarity no less than elegance. A book worthless to me may convey something of value to my neighbor. In the free society to which our Constitution has committed us, it is for each to choose for himself." [72]

* * * * *

This brief returns to its place of beginning. A man has been sentenced to spend five years in prison for mailing copies of a magazine, a pamphlet and a book—publications he could not have known in advance of this Court's opinion might involve him in criminal activity. A man's liberty has been sacrificed to the changing winds of constitutional

---

[71] *Roth* v. *United States*, 354 U. S. 484, 487 (1957).

[72] Stewart, *J.*, dissenting, Slip Op., pp. 1-2.

doctrine. His conviction has been affirmed by a bare majority of this Court upon a theory rejected by prior decisions of this Court—a theory never urged by the Government nor employed by the courts below to support his conviction—a theory against which he has never had an opportunity to defend and which has never been argued or briefed in this Court—a theory which is replete with dangerous implications for freedom of expression and which demands reconsideration and ultimate discard.

CONCLUSION

For the foregoing reasons, the petition for rehearing should be granted.

Respectfully submitted,

BERNARD A. BERKMAN
1320 The Superior Building
Cleveland, Ohio 44114

MELVIN L. WULF
156 Fifth Avenue
New York, New York 10010

MURRAY POWLEN
1405 Locust Street
Philadelphia, Pennsylvania

Attorneys for Amici Curiae

April 1966